

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

K.W.,

Plaintiff,

v.

JANKI MOTEL, INC.,

Defendant.

CIVIL ACTION FILE

NO. 1:25-cv-3201-TRJ

T.O.,

Plaintiff,

v.

JANKI MOTEL, INC.,

Defendant.

CIVIL ACTION FILE

NO. 1:25-cv-3202-TWT

S.D.,

Plaintiff,

v.

JANKI MOTEL, INC.,

Defendant.

CIVIL ACTION FILE

NO. 1:25-cv-3203-JPB

**CONSENT MOTION TO REASSIGN AND
CONSOLIDATE RELATED CASES**

The parties ask that the Court consolidate the above-captioned cases in the first-filed action: *K.W. v. Janki Motel, Inc.*, No. 1:25-cv-3201-TRJ (N.D. Ga., filed June 6, 2025). These cases arise out of the same material facts and assert the same claims against the same Defendant who owned the hotel during all relevant time periods.

On June 6, 2025, Plaintiffs K.W., T.O., and S.D. filed three cases against Janki Motel, Inc. Despite identifying their cases as related on all three civil cover sheets, the cases were inadvertently assigned randomly to separate judges rather than to a single judge. Their first case against Janki Motel, Inc. was assigned to Judge Tiffany R. Johnson. The other two cases were assigned to Judge Thomas W. Thrash Jr. and Judge J. P. Boulee. Plaintiffs have served both their complaints and the summonses on Janki Motel, Inc.

Given the similar factual allegations and identical legal theories alleged in both cases, consolidation and coordination of these cases will not only promote judicial economy but will also serve the interests of justice.

Federal Rule of Civil Procedure 42(a) authorizes a district court to consolidate civil actions that “involve a common question of law or fact.” The Eleventh Circuit has long encouraged district courts “to make good use of Rule 42(a) in order to expedite the trial and eliminate unnecessary repetition and confusion.” *Jackson v. Ford Consumer Fin. Co.*, 181 F.R.D. 537, 539 (N.D. Ga. 1998) (quoting *Hendrix v.*

Raybestos-Manhattan, Inc., 776 F.2d 1492, 1495 (11th Cir. 1985)). And this court has held that “where two actions involving the same parties and the same issues are pending in either the same federal court or in different federal courts, the interest in judicial economy militates heavily in favor of either staying one of the actions or consolidating them.” *Home Ins. Co. v. Coastal Lumber Co.*, 575 F. Supp. 1081, 1083 (N.D. Ga. 1983).

Plaintiffs’ cases against Janki Motel, Inc. involve the same factual and legal issues, including:

- (1) whether Defendant (through its employees and agents) participated in or assisted and facilitated the Plaintiffs’ sex trafficking at Defendant’s America’s Best Value Inn location; and
- (2) whether Defendant benefited financially from operating the hotel where each Plaintiff was harbored and maintained despite the fact that Defendant should have known that each Plaintiff was being sold for sex at those hotels.

Common questions of fact and law exist between the related cases. Each case alleges the owner and operators of the hotel where Plaintiffs were sex trafficked are liable for each Plaintiff’s injuries therefrom. Significant judicial economy will be achieved by consolidating the actions, particularly during the pretrial proceedings.

Accordingly, the parties ask that this Court issue an Order consolidating her case against Janki Motel, Inc. with the first-filed action: *K.W. v. Janki Motel, Inc.*, No. 1:25-cv-3201-TRJ (N.D. Ga., filed June 6, 2025).

—signatures appear on the following page—

Respectfully submitted on August 11, 2025.

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CERTIFICATE OF COMPLIANCE

Under Local Rules 5.1(C) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font type and size requirements and is formatted in Times New Roman, 14-point font.

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